



January 13, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of the University of Miami's Jerry Herman Ring Theatre, located in Coral Gables, FL, that provides approximately forty eight performances a year to 14,000 audience members and education programs to 150 students, I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and

also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

During a show, our theatre will use up to twenty wireless microphones, which includes a mixture of body microphones and handheld microphones, and four wireless headsets in order to make the show successful. Every show that we put on uses at least some of the wireless equipment. The body packs that our actors use run in the 662 – 698MHz range and can be tuned to different frequencies. The handheld microphones that we use run in the 598 – 620MHz range, and all have fixed frequencies. And finally, the wireless headsets that our stage crew relies on run in the 470 – 608MHz range, and can be tuned into different frequencies.

We own all of the wireless equipment that we use in our theatre, and we hope to continue to use this equipment for many years. The move out of the 700 MHz band was very stressful on our department financially, and would have a severely negative impact on the production quality and therefore our students' education, if we would have to buy new wireless equipment again. I think that the only way our organization would be able to obtain new wireless equipment would be if we were reimbursed for the expenses.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional and educational performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional and educational performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,



Pablo Souki
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